

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW HAMPSHIRE

In re: Woodrow M. & Liliana Medina,  
Debtors

Bk. No. 12-10166-JMD

Chapter 13

MOTION TO WITHDRAW

NOW COMES Sandra A. Kuhn, Esq. and FAMILY LEGAL SERVICES, PC. Aka FAMILYLEGAL And file this Motion to Withdraw As Counsel for the Debtors, effective immediately. In support of this Motion, Sandra A. Kuhn, Esq. and FAMILYLEGAL state as follows:

1. The Debtors filed for Chapter 13 bankruptcy protection on or about January 20, 2012. The petition was filed by Attorney Runge of FAMILYLEGAL.
2. A breakdown of the attorney client relationship has occurred which makes representation of the Debtors extremely difficult and problematic for undersigned counsel and undersigned's counsel's law firm.
3. Undersigned counsel has attempted to resolve the issue with the Debtors. Undersigned counsel sent an e-mail the Debtors on or about May 15, 2012 indicating that the Debtors were not listening to counsel and indicating that unless the issue was resolved, undersigned counsel believed it best for the law firm to withdraw as counsel for the Debtors.
4. There was no response from Debtors. Undersigned counsel thereafter sent another email on May 22, 2012 indicating a lack of response on the issue from the Debtors and that there was not much that undersigned counsel or the law firm could do for the Debtors if they were not willing to listen or did not value the services being provided.
5. The only response received from the Debtors were whether the worker's compensation settlement was approved by the Court, for which undersigned counsel replied.
6. The Trustee has a pending Motion to Dismiss scheduled for May 25, 2012 on the grounds of lack of payment and feasibility. Counsel believes the issues raised therein are fully resolvable, especially in light of the approval of the worker's compensation settlement which will provide Debtors with some funds which may be used to address both issues. However, Debtors have indicated that they want to have a hearing on May 25, 2012 to address their questions to the Court directly

relative to modification of their ongoing mortgage payments and their plan payments.

7. The mortgage lender has filed a recent objection to confirmation which appears to be on the grounds that a Motion to Determine Secured Status needs to be filed to strip their lien and it cannot be done in the plan.
8. These issues are easily resolvable but given the relationship between Debtors and counsel, counsel cannot resolve the issue at this point. Counsel has identified the issues for Debtors or their "to be hired new counsel" to address.
9. Given all of the above, Counsel requests that the Court allow her, Attorney Runge and FAMILY LEGAL SERVICES, PC to withdraw from representation of the Debtors immediately.

WHEREFORE, Counsel prays that the Court:

- A. ALLOW Sandra A. Kuhn, Esq., Jeffrey Runge, Esq. and FAMILY LEGAL SERVICES, P.C. to withdraw as counsel for the Debtors effective immediately;  
AND
- B. GRANT such other relief as is just and necessary.

Respectfully Submitted,  
Family Legal Services, P.C.

\_\_5/24/2012\_\_\_\_\_  
Date

By: /s/ Sandra A. Kuhn \_\_\_\_\_  
Sandra A. Kuhn, Esq.  
Family Legal Services, P.C.  
BNH 03832  
141 Airport Road  
Concord, NH 03301  
(603) 225-1114

#### CERTIFICATE OF SERVICE

I hereby certify that a true copy of the Motion To Withdraw was mailed on the  
24<sup>th</sup> day of May 2012 to the parties on the attached service list.

\_\_5/24/2012\_\_\_\_\_  
Date

By: /s/ Sandra A. Kuhn \_\_\_\_\_  
Sandra A. Kuhn, Esq.

